

William C. Rand, Esq. (WR-7685)
LAW OFFICE OF WILLIAM COUDERT RAND
488 Madison Avenue, Suite 1100
New York, New York 10022
Phone: (212) 286-1425; Fax: (646) 688-3078
Co-Counsel
Do Kyung Kim (DK 1352)
150-03 Northern Blvd., Second Floor
Flushing, NY 11355
Tel.: (718) 460-2435
Fax: (888) 456-7938
Attorney for Plaintiffs

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----	X
KI DONG JUNG	:
on behalf of himself and others similarly situated,	: Case No.: 2:13 Civ. 4020
	: (JS)(WDW)
Plaintiff,	:
	:
-against-	:
	:
MAL SOON KIM, YEO HAN KIM and	:
INTERNATIONAL LEATHER CARE COMPANY CORP.:	:
	:
Defendants.	:
-----	X

NOTICE OF MOTION FOR LEAVE TO FILE AN AMENDED COMPLAINT

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 15(a)(2), upon the accompanying declaration of Plaintiff’s counsel, William C. Rand, Esq., and the exhibits attached thereto and all pleadings filed herein, a motion for the Court’s leave to file an amended complaint will be made by Plaintiff on May 28, 2014, or earlier date set by the Court, before the Honorable Joanna Seybert, United States District Court, Eastern District of New York, 100 Federal Plaza, Central Islip, New York 11722.

Dated: New York, New York
May 7, 2014

LAW OFFICE OF WILLIAM COUDERT RAND

s/William C. Rand

William Coudert Rand, Esq.
Attorney for Plaintiff, Individually,
and on Behalf of All Other Persons Similarly Situated
488 Madison Avenue, Suite 1100
New York, New York 10022
Tel: (212) 286-1425
Co-Counsel
Do Kyung Kim (DK 1352)
150-03 Northern Blvd., Second Floor
Flushing, NY 11355
Tel.: (718) 460-2435
Fax: (888) 456-7938
Attorney for Plaintiffs

TO:

Ira S. Newman, Esq.
Law Offices of Ira S. Newman
Suite 441 – South
98 Cutter Mill Road
Great Neck, N.Y. 11021

